

# HOUSING AUTHORITY OF THE COUNTY OF LOS ANGELES

## PRESENTATION TO THE COMMISSION ON DISABILITIES

Presented by Rebecca Yee, Assistant Director and Risk Manager  
September 16, 2015



700 West Main Street, Alhambra, CA 91801

# AMERICANS WITH DISABILITIES ACT (ADA)

# Mission Statement



The Housing Authority of the County of Los Angeles (HACoLA) is a service animal friendly agency committed to compliance with the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964 and related regulations and directives. HACoLA assures that no person shall on the grounds of race, color, national origin, gender, disability or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any HACoLA service, program or activity. HACoLA will not discriminate against qualified individuals with disabilities in any employment practices, services, programs, or activities.

HACoLA adheres to all applicable Federal and State laws, regulations, and guidelines with respect to providing reasonable accommodations to allow for equal opportunity to all.



# Assisted Housing Programs and Services

## HACOLA Assisted Housing Programs Include:

### Section 8 Voucher:

The Section 8 Housing Choice Voucher (HCV) program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Participants are free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. A family that is issued a voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. HACOLA is currently assisting 21,757 households.

### Section 8 Owner Program:

The owner is expected to provide the services agreed to as part of the lease signed with the family and the contract signed with the Housing Authority. The tenant's rental subsidy, known as the Housing Assistance Payment (HAP), is paid directly to the property owner or designated payee each month. No charges or fees are assessed to owners for services provided under the Section 8 program. Participating property owners comply with U.S. HUD regulations, but retain control of most of the rights and responsibilities traditionally held by property owners.



### Project Based Voucher Program (PBV):

The PBV Program assists individuals and families in designated apartment buildings. HACOLA currently assists 517 PBV households.

- El Monte Veterans
- Jasmine Gardens
- Juanita Villas
- Mason Court
- Mid-Celis Apartments
- Mosaic Gardens
- San Fernando Community Housing
- Seasons at Compton
- Westside II
- Casa Dominguez
- Encanto Court
- Sierra Bonita
- Terra-Bella
- Villa Nueva Apartments

# Assisted Housing Programs and Services



**Veterans Affairs Supportive Housing (VASH):** Supportive services are provided by the Veterans Affairs Medical Center (VAMC). The VAMC will screen applicants for program eligibility and service needs and will refer clients to the Housing Authority for rental assistance. The Housing Authority will house households.

**Shelter Plus Care/Continuum of Care Program:** The Shelter Plus Care (SPC)/Continuum of Care (CoC) Programs are certificate-based programs designed to link rental assistance with supportive services for homeless individuals and families with disabilities. These programs primarily provide assistance to those with serious mental illness, chronic substance abuse problems, and/or acquired immunodeficiency syndrome (AIDS) or related diseases. HACoLA currently assists 911 SPC/CoC households.

**Moderate Rehabilitation Affordable Housing Program:** The Moderate Rehabilitation (Mod Rehab) Program was designed in 1978 to be an expansion of the rental certificate program. The rental certificate program required a minimum expenditure of \$1,500 in repairs to meet the program housing quality standards. After the work was completed, owners entered into a 15-year Housing Assistance Contract with the local housing authority. Using this contract, the housing authority helped the owner repay the loan by subsidizing the rents of low-income participants at a higher-than-fair market rate. The contract tied rental subsidies to the building not the participant. Although funding is no longer available for new participants, the Housing Authority continues to administer existing contracts under this program. HACoLA currently assists 119 Mod Rehab households.

**Family Self-Sufficiency (FSS) Program:** The family self-sufficiency program is a five-year voluntary program designed to help families achieve economic self-sufficiency by providing case management and referrals to supportive social services. HACoLA currently assists 594 FSS households.

# Public & Affordable Housing Programs and Services



HACoLA Public Housing refers to specific housing developments owned and operated by the Housing Authority; units are leased directly to families. Public housing is comprised of all sizes and types, from scattered single-family houses to high-rise apartments for elderly families. The Housing Authority currently manages 2,962 units of public housing at 63 sites throughout Los Angeles County. Additionally, the Housing Authority manages 267 units at 5 affordable sites throughout Los Angeles County. Public and Affordable Housing Site Include:

## **Affordable Housing Sites:**

- Lancaster Homes - Senior Development)
- Kings Road - Senior Development)
- Santa Monica RHCP - Family Development)

## **Public Housing Sites:**

- Carmelitos – Senior & Family Development
- Harbor Hills – Senior & Family Development
- Nueva Maravilla - Senior & Family Development
- *West County I* - Senior Developments
  - Palm Apartments
  - Westknoll Apartments
- *West County II* - Senior & Family Developments
  - Marina Manor I and II (Senior)
  - Monica Manor (Family)
  - Ocean Park (Family & Senior)

## *North County – Senior & Family Developments*

- Foothill Villa (Senior)
- Orchard Arms (Senior)
- Quartz Hill I & II (Family)

## *East County - Senior & Family Developments*

- Includes 10 developments located throughout East Los Angeles

## *South County – Family Developments*

- Includes 20 developments located throughout South Los Angeles

For location information regarding Section 8 Programs, Affordable Housing and Public Housing programs, please visit [www.hacola.org](http://www.hacola.org)

# Title II State and Local Governments



HACoLA shall comply with all requirements of the ADA including Title II and shall ensure equal access to all in employment and programs and services provided by and administered by HACoLA.

## **HACoLA ensures compliance by allowing for, providing and ensuring the following:**

- Program Access through necessary devices or reasonable modification including accessible routes with continuous, unobstructed paths connecting all accessible elements and spaces in a building or facility. This includes pathways, corridors, doorways, floors, ramps, elevators and clear floor space at fixtures.
- Service Animals: The Commission/HACoLA is a service animal friendly agency. Dogs that have been individually trained to do work or perform tasks for the benefit of an individual with a disability are welcome.
- Wheelchairs, other power-driven mobility devices and other mobility devices are welcome and are permitted in all areas of public use.
- Providing notice of availability of materials in alternate format on public notices and documents including allowance for request of assistive aids.
- Designated ADA/Section 504 Coordinator to oversee ADA Compliance for the Commission/HACoLA.
- Established grievance procedure and informal complaint procedures to investigate and address Title II complaints.
- Providing ADA training and resources to Commission/HACoLA staff to ensure compliance and equal treatment.
- The Commission/HACoLA shall allow for modification of policies, practices and procedures, provide for effective communication, and removal of physical or communication barriers.

# Title III: Public Accommodations



HACoLA ensures compliance with Title III Public Accommodations by allowing for, providing and ensuring the following:

- Designating and ADA/Section 504 Coordinator to ensure compliance and forming a ADA Advisory Committee consisting of staff from various departments to assist with identification and correction of physical and program barriers.
- Completion of ADA/Section 504 Assessments of HACoLA owned property sites where public access is granted.
- Completion of ADA/Section 504 Assessments of HACoLA administrative offices.
- Mitigating readily achievable barrier removals and developing a plan to address other barriers identified based on level of severity, cost of remedy, and necessary action for remedy.
- Providing notice to all contractors and potential contractors of their obligation to comply with and adhere to the Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973 and compliance with Executive Order 11246 and 11375, Equal Opportunity in Employment, during the performance of this Contract.
- Modifying testing sites as needed based on request.
- Striving to ensure compliance with Section 508 of the Rehabilitation Act of 1973 and/or the World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG), including public access kiosks.



# Quality Assurance and Action Planning



HACoLA has a designated an ADA/504 COORDINATOR and ADA/504 Representatives to carry out the agency's compliance with nondiscrimination requirements of the ADA.

- **ADA/Section 504 Coordinator**
- ADA/Section 504 Representatives
- ADA Advisory Committee
- Accessibility Assessment of Facilities
- Self Evaluation of Policies & Procedures
- Transition Plan

## COMMISSION / HACoLA ADA REPRESENTATIVES

**JULIETTE LARIN**  
**ADA COORDINATOR**

Administrative Services  
(626) 586-1695

**REBECCA YEE**

Administrative Services  
(626) 586-1858

**TRACEY CURRY**

Administrative Services  
(626) 586-1687

**AL LIMBRICK**

Housing Management  
(323) 260-2184

**MARIO VAZQUEZ**

Housing Management  
(626) 586-1924

**MONA VEGA**

Assisted Housing  
(626) 586-1650



# Complaint and Grievance Procedures



Grievance Procedures are established to meet the requirements of the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, and all other federal and State laws. It provides a just and equitable method for the resolution of grievances without discrimination, coercion, restraint or reprisal against complainants. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in practices and policies or the provision of services, activities, employment, programs or benefits.

Use of the Housing Authority's grievance procedure in no way impairs an individual's pursuit of other remedies under the ADA such as filing an ADA complaint with the responsible federal department, agency, or court.

## **Filing a Complaint:**



The complaint should be submitted by the complainant or a designated representative as soon as possible, but no later than 180 calendar days after the alleged violation to:

**JULIETTE LARIN, ADA COORDINATOR**  
**Housing Authority of the County of Los Angeles**  
**700 W. Main Street, Alhambra, CA 91801**

(626) 262-4511 | TTY for Recruitment (626) 943-3898 | Fax (626) 943-3898  
Housing Authority Inquiries or Concerns  
Toll Free (855) 892-6095 | TTY 626-943-3899 for Inquiries and Concerns

Complaint forms are available online at [www.lacdc.org](http://www.lacdc.org)

# Notice of Non-Discrimination and Service Animal Notice for Employees



**COMMUNITY DEVELOPMENT COMMISSION  
HOUSING AUTHORITY  
of the COUNTY OF LOS ANGELES  
Risk Management Unit**  
700 W. Main Street, Alhambra, CA 91801  
(626) 262-4511 | TTY (626) 943-3898 | Fax (626) 943-3898  
Commission: [www.lacdc.org](http://www.lacdc.org) | Housing Authority: [www.hacola.org](http://www.hacola.org)

## NOTICE OF NON-DISCRIMINATION ON THE BASIS OF DISABILITY

The Community Development Commission / Housing Authority of the County of Los Angeles is a service animal friendly agency and does not discriminate on the basis of disability in employment or in the admission to, access to, or operation of programs, services or activities.

Pursuant to the Americans with Disabilities Act (ADA), individuals who need accessible communication aids or other accommodations to participate in programs or activities are invited to make their needs and preferences known to an ADA/504 REPRESENTATIVE.

The agency has a designated ADA/504 COORDINATOR and ADA/504 Representatives to carry out compliance with nondiscrimination requirements of the ADA. Information concerning the provisions of ADA/504 and this agency's compliance is available by contacting any of the ADA/504 REPRESENTATIVES indicated below. An internal grievance procedure is available to resolve complaints.

### COMMISSION AND HOUSING AUTHORITY ADA/504 REPRESENTATIVES

<b>JULIETTE LARIN</b> Administrative Services (626) 586-1695	<b>REBECCA YEE</b> Administrative Services (626) 586-1858	<b>TRACEY CURRY</b> Administrative Services (626) 586-1687
<b>AL LIMBRICK</b> Housing Management (323) 260-2184	<b>MARIO VAZQUEZ</b> Housing Management (626) 586-1924	<b>MONA VEGA</b> Assisted Housing (626) 586-1650

### Americans with Disabilities Act (ADA) Grievance Procedures

#### Filing a Complaint:

- The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, location, date and description of the incident. Alternative means of filing a complaint, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities, upon request.
- The complaint should be submitted by the complainant or a designated representative as soon as possible, but no later than 180 calendar days after the alleged violation to:

**JULIETTE LARIN, ADA COORDINATOR**  
Community Development Commission of the County of Los Angeles  
Housing Authority of the County of Los Angeles  
700 W. Main Street, Alhambra, CA 91801  
(626) 262-4511 | TTY for Recruitment (626) 943-3898 | Fax (626) 943-3898  
Housing Authority Inquiries or Concerns  
Toll Free (855) 892-6095 | TTY 626-943-3899 for Inquiries and Concerns


Grievance Procedures are established to meet the requirements of the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, and all other federal and State laws. It provides a just and equitable method for the resolution of grievances without discrimination, coercion, restraint or reprisal against complainants. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in practices and policies or the provision of services, activities, employment, programs or benefits.

#### Grievance Records:



All written complaints received by the ADA Coordinator, appeals to the Administrative Services Director or designee, and responses from the ADA Coordinator and Administrative Services Director or designee will be kept on file for at least 3 years.

Use of the Commission/Housing Authority's grievance procedure in no way impairs an individual's pursuit of other remedies under the ADA such as filing an ADA complaint with the responsible federal department, agency, or court.

Additional information can be obtained from the CDC/HA ADA Coordinator.  
This information is available in alternative formats upon request.



Revised January 2013



**COMMUNITY DEVELOPMENT COMMISSION  
HOUSING AUTHORITY  
OF THE COUNTY OF LOS ANGELES  
RISK MANAGEMENT  
SERVICE ANIMALS**

## OVERVIEW

This notice provides guidance on the term "service animal" and the service animal provisions in the Department of Justice's new regulations implementing the Americans with Disabilities Act (ADA) for Title II (State and local government services) and Title III (public accommodations and commercial facilities).

- Beginning on March 15, 2011, only dogs are recognized as service animals under titles II and III of the ADA. A service animal is a dog that is individually trained to do work or perform tasks for a person with a disability.

Generally, Title II and Title III entities must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

## HOW IS "SERVICE ANIMAL" DEFINED

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting/protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA.

This definition does not affect or limit the broader definition of "assistance animal" under the Fair Housing Act or the broader definition of "service animal" under the Air Carrier Access Act.

## WHERE SERVICE ANIMALS ARE ALLOWED

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go.


## SERVICE ANIMALS MUST BE UNDER CONTROL

Under the ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

### Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animal

- When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.
- Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a community room or dining / recreation room, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.
- A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.
- Establishments that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.
- People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.
- If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.
- Staff is not required to provide care or food for a service animal.

For more information about the ADA please visit the ADA Website: [www.ADA.gov](http://www.ADA.gov)  
ADA Information Line: 800-514-0301 (Voice) and 800-514-0383 (TTY)



Revised December 2012

THIS DOCUMENT IS NOT INTENDED FOR DISTRIBUTION TO THE PUBLIC OR RESIDENTS

# ADA RESOURCES



- Job Accommodation Network: [www.askjan.org](http://www.askjan.org) | Voice/TTY (800) 526-7234

*JAN is a free, confidential service from the U.S. Department of Labor's Office of Disability Employment Policy that provides individualized accommodation solutions and technical assistance on the ADA which include Accommodation options and low-cost solutions, Hiring, retaining and promoting qualified employees with disabilities, Employer responsibilities under the ADA and Addressing accessibility issues, including accessible technology.*

- U.S. Department of Justice: [www.ada.gov](http://www.ada.gov) | (800) 514-0301 or TTY (800) 514-0383

*The ADA Home Page includes many excellent resources for employers. The "ADA Business Connection" section of the site includes business briefs and tax incentive information.*

- Equal Employment Opportunity Commission: [www.eeoc.gov](http://www.eeoc.gov) | (800) 669-4000

*The EEOC enforces the ADA's employment provisions. The section of its Web site titled "Disability Discrimination" provides access to numerous publications, including several specifically designed to answer employer questions and concerns.*

- U.S. Access Board: [www.access-board.gov](http://www.access-board.gov) | (800) 872-2253

*The U.S. Access Board is a federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards for the built environment, transportation, communication, medical diagnostic equipment, and information technology.*

- Regional ADA Centers: [www.adata.org](http://www.adata.org) | (800) 949-4232

*ADA National Network provides information, guidance and training on the Americans with Disabilities Act (ADA). Our services are tailored to meet the needs of business, government and individuals at local, regional and national levels*

- National Center on Accessibility: [www.ncaonline.org](http://www.ncaonline.org) | (812) 856-4422 voice or TTY (812) 856-4421

*NCA was established through a cooperative agreement between Indiana University and the National Park Service. Over the last two decades, NCA has emerged as a leading authority on access issues unique to park and recreation programs and facilities*